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March 10, 2006

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Dear Barry and Cindy:

First, thank you for the hard work you and your staffs have done to respond to the various comments from the Integrating Working Group, including those of the Metropolitan Transportation Commission (MTC). It's a difficult task, but real headway is being made on the Goods Movement Action Plan.

Based on the revised version for Phase 2 "Framework for Action", we have the following comments:

1. Several changes, particularly the addition of Chapter V, assume the successful passage of an infrastructure bond package, and some dedicated revenues for freight and freight related mitigations. Recognizing this is a working assumption, we would note that MTC does not support earmarking the proposed bond revenues for a pre-determined list of projects—goods movement or otherwise. We support the initial thinking presented in the Governor's Strategic Growth Plan (SGP) that goods movement projects be selected consistent with a completed Goods Movement Action Plan, that should be periodically reviewed and updated as circumstances demand.
2. Regarding the proposed goods movement element of the SGP, it was mentioned at the outset that the bond funding was intended to leverage federal and private sources, but that the STIP was not be used as a matching source. It must be noted that the vast majority of federal highway funds coming to the State of California flow through the STIP—so prohibiting the STIP as an element in a trade infrastructure-funding package represents a lost federal leveraging opportunity.
3. Regarding Chapter V on "Simultaneous and Continuous Improvement", it is unclear how the process would work to establish air emission reductions for particular corridors, the verification of achieving those standards (or not); and how the "ramifications" for non-achievement are determined and

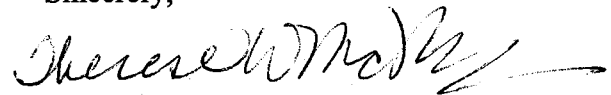
administered. We acknowledge that this section is in many ways an "opening" proposal, but among other things—how would air emission reduction targets be differentiated for goods movement projects at a corridor level? What are the expected roles of regional air districts, and regional transportation agencies? Finally, is it envisioned that the only "hook" for urging compliance is a withholding of bond dollars?

4. Finally, we would like to make yet another push for a stronger statement on land use. We agree with the language in the report that "[a]s land use planning is primarily a local function, it is crucial that local land use policies be strengthened to ensure that incompatible uses (e.g. residential) do not encroach on goods movement facilities and corridors. Land use decisions for goods movement corridors must be incorporated under these principles." Therefore, we urge you to include in the Preliminary Candidate Actions one that reads:

"Develop economic preservation/development zones for goods movement activities and their supportive industries that a) minimize conflicts between residential and industrial uses in areas surrounding ports and intermodal facilities; and b) concentrates goods related services (warehousing, distribution centers etc.) so as to minimize truck vehicle miles traveled—and the associated congestion and air quality impacts-- generated by linking those activities to one another."

Thanks for the opportunity to provide these brief comments. Should you have any questions regarding this letter please contact me (510/817-5830), or Doug Kimsey, MTC's Director of Planning (510/817-5790).

Sincerely,



Therese W. McMillan  
Deputy Executive Director, Policy

cc: Jack Broadbent, BAAQMD  
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